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March 18, 2020

VIA ECF

Honorable Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, New York 11201

Re: *DJ Direct, Inc. v. OMM Imports, Inc. d/b/a/ Zero Gravity, et al.*
Civil Action No.: 1:19-cv-02541 (MKB) (VMS)

Dear Judge Scanlon:

This firm represents Plaintiff DJ Direct, Inc. in the above matter. We submit this letter jointly with counsel for Defendants OMM Imports, Inc. ("OMM"), Brea's Cosmetic Corp. and David Zur (collectively "Defendants") to report on the status of the case, per Your Honor's Order of January 22, 2020.

The parties have continued to actively pursue settlement. We have agreed upon a framework, but the specific terms and agreements that will govern the relationship between the parties after the litigation is resolved are in the process of being drafted and negotiated. Due to the details involved in negotiating a complex distribution agreement, there are still several details that have yet to be worked out.

Plaintiff served its initial discovery requests on Defendants on January 20, 2020. Defendants have yet to serve any discovery requests, and hope that doing so will remain unnecessary. Accordingly, there are no outstanding discovery disputes at this time.

In order to give the parties sufficient time to finalize what is a very complicated settlement and distributorship agreement, the parties respectfully request an additional sixty (60) day stay of discovery to finalize the terms of the settlement and distribution agreements.

Respectfully submitted,

STERN & SCHURIN, LLP


Steven Stern